



Mel Carnahan Governor Stephen M Mahfood Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

PO Box 176 Jefferson City MO 65102-0176

October 7, 1999

Mr Rodney Salimi
Project Manager, Environmental Engineering
Dynamic Technology Systems, Incorporated
4900 Seminary Road, Suite 701
Alexandria, VA 22311

RE St Louis Job Corps Center, 4333 Goodfellow Boulevard, St Louis, Missouri

Dear Mr Salimi

The Enforcement Section of the Hazardous Waste Program (HWP) has received and reviewed your submittal titled "Environmental Assessment and Training Report" as required by the April 19, 1999, Settlement Agreement between the St Louis Job Corps, the Missouri Department of Natural Resources (MDNR), and the Attorney General's Office

In accordance with the terms of the Settlement Agreement, the Job Corps shall immediately correct all violations observed during the audit Page four of the Settlement Agreement specifically states "Should violations be discovered during the audit, the United States Department of Labor by and through its Job Corps Center Operator shall immediately take action to correct the violations and return to compliance The MDNR agrees not to take further enforcement action, including assessment of a civil penalty, against the United States Department of Labor and Job Corps Center Operator and its contractor for violations noted in the voluntarily audit as long as the violations are immediately addressed and corrected, either by remedial action upon the MDNR's approval or a MDNR approved work plan to address the violations "

Within 30 days upon receipt of this letter the Job Corps shall address and/or respond with a plan, if necessary, to address the following items

- 1 The Job Corps shall make a waste determination on the electrical switches that were stored outside of the welding shop as noted on page 12 of the audit report If the switches are determined to be a waste and contain PCB's and/or mercury,

Site St Louis Ordnance Plant

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the Job Corps shall immediately over pack the switches in an approved container to prevent releases into the environment. The waste shall be packaged, marked, and labeled and moved to the hazardous waste storage area for offsite shipment to an approved facility that can accept the types of waste identified. The Job Corps shall provide documentation, including the date this action was completed, to the HWP that demonstrates compliance with the Missouri Hazardous Waste Management Law and regulations.

- 2 The Job Corps shall make a determination on the two drums identified in the Cement and Masonry area as described on page 11. If the Job Corps determines the drums contain hazardous waste, the waste must be packaged, marked, and labeled and moved to the hazardous waste storage area for offsite shipment to an approved facility that can accept hazardous waste. The Job Corps shall provide documentation to the HWP, including the date this action was completed, that demonstrates compliance with the Missouri Hazardous Waste Management Law and regulations.

If the Job Corps determines that the drums do not contain hazardous waste, please explain when and how the material will be used or managed.

- 3 The Job Corps shall inventory the "old" chemicals, as described in the Maintenance and Storage area on page 10, and separate usable product from waste. Waste determined to be hazardous must be packaged, marked, and labeled and moved to the hazardous waste storage area. The Job Corps shall provide documentation, including the date this action was completed, to the HWP that demonstrates compliance with the Missouri Hazardous Waste Management Law and regulations.
- 4 The Job Corps shall determine if the "can" used to store thinners and varnishes, as described on page 12 in the Paint Shop area meets the established criteria for a hazardous waste satellite accumulation container. If so, the Job Corps shall mark and date the container accordingly and provide documentation, including the date this action was completed, which demonstrates compliance with the Missouri Hazardous Waste Law and regulations.
- 5 It should be noted that the MDNR's Air Pollution Control Program regulates asbestos and asbestos contaminated material. As I understand, asbestos is subject to regulation when an established amount is removed. Removed asbestos was not identified in the report. However, should the Job Corps remove any asbestos in the future, regardless of type, I recommend you contact

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the MDNR's Air Pollution Control Program at (573) 751-4817 to obtain information regarding it's removal and management

If you have any questions regarding this letter, please contact me at (573) 751-2032
Please send a copy of your response to me at the letterhead address with a copy of the same to Mr Mike Struckhoff, St Louis Regional Office, 10805 Sunset Office Drive, St Louis, MO 63127-1017

Sincerely,

HAZARDOUS WASTE PROGRAM



John Jurgensmeyer
Environmental Specialist
Hazardous Waste Enforcement Unit

JJ jh

c Mr Gerald A Isby-Davis, Project Manager, U S Department of Labor
Mr Sterling Roath, Jr , Center Director, St Louis Job Corps Center
Mr Mike Struckhoff, St Louis Regional Office
Ms Kara Valentine, Attorney General's Office